

305 Madison Avenue New York, NY 10165 T: 212-922-1080 F: 212-949-8255

Paul S. Hugel Partner hugel@clayro.com

November 8, 2024

Via ECF

Hon. Orelia E. Merchant United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Styleline Studios Int'l Ltd v. Litvack - 24-cv-01192-OEM-JMW

Dear Judge Merchant:

I represent Defendant Jay Litvack in the above-referenced matter. I am submitting herewith a stipulation executed by me and by counsel for Plaintiff Styleline Studios International Limited for a modification of the preliminary injunction issued in this matter on August 16, 2024. [Dkt. No. 58]. That preliminary injunction, issued in response to a motion filed by Styleline Studios International, enjoined Mr. Litvack from, *inter alia*, selling J/SLIDES branded merchandise, subject to certain exceptions.

The purpose of the modification set forth in the stipulation is to conform the preliminary injunction with the terms of a settlement agreement entered into by Styleline Studios International on October 30, 2024, in *Hilldun Corporation v. Styleline Studios LLC et al.* Supreme Court, New York County, Index No. 652334/2024. Pursuant to that settlement agreement, Styleline Studios International agreed, inter alia, to permit Jay Litvack to oversee the liquidation of Styleline Studios LLC's existing inventory, including J/SLIDES branded merchandise covered by the preliminary injunction, for the purpose of paying the debt owed by Styleline Studios LLC to Hilldun Corp. The attached stipulation carves out from the scope of the preliminary injunction the sale of that inventory undertaken in accordance with the terms of the settlement agreement.

We therefore respectfully request that the Court so ordered the attached stipulation.

Very truly yours,

/s

Paul S. Hugel

cc: All counsel (via ECF)